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BEFORE

THE PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

DOCKET NO. 2013-201-WS

IN RE: Application of Utilities Services of South)	REBUTTAL TESTIMONY
Carolina for Adjustment of Rates and)	
Charges and Modifications to Certain)	OF
Terms and Conditions for the Provision of)	
Water and Sewer Service)	KAREN SASIC
_____)	

2 **Q. ARE YOU THE SAME KAREN SASIC THAT HAS PREFILED DIRECT**
3 **TESTIMONY IN THIS CASE?**

4 **A. Yes, I am.**

5 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN THIS**
6 **PROCEEDING?**

7 **A. The purpose of my rebuttal testimony is to respond on behalf of Utilities Services**
8 **of South Carolina (USSC) to the testimony of ORS witness Willie J. Morgan and to**
9 **address concerns raised by the public witnesses at the night hearings in this docket held**
10 **on October 1, 2013 and October 3, 2013.**

11 **Q. HAVE YOU REVIEWED THE PRE-FILED TESTIMONY OF MR. WILLIE**
12 **MORGAN ON BEHALF OF ORS IN THIS MATTER?**

13 **A. Yes, I have reviewed his testimony.**

14 **Q. DO YOU AGREE WITH THE PROPOSED ADJUSTMENT BY ORS TO THE**
15 **TEST YEAR WASTEWATER SERVICE REVENUES FOR THE WIKOFF**
16 **COLOR CORPORATION?**

1 **A.** No, I do not. USSC discovered a mathematical error in Exhibit WJM-2 for the
2 calculated test year revenue indicated for the Wikoff Plant of \$95,363. In consultation
3 with the ORS, it has been determined that the correct test year revenue amount should be
4 \$7,947.

5 **Q. IN HIS TESTIMONY, MR. MORGAN STATES USSC CHARGED CUSTOMERS**
6 **TAMPERING FEES TOTALING \$2,110 DURING THE TEST YEAR. HAS THE**
7 **COMPANY REFUNDED THOSE CUSTOMERS WHO WERE**
8 **INADVERTENTLY CHARGED THIS FEE?**

9 **A.** Yes, we have refunded those customers who were inadvertently charged a
10 tampering fee. During the audit review, the company provided ORS information for each
11 account showing the reversal of the charges.

12 **Q. IN HIS TESTIMONY, MR. MORGAN STATES USSC ALSO CHARGED TWO**
13 **CUSTOMERS A METER FEE OF \$75 EACH DURING THE TEST YEAR. HAS**
14 **THE COMPANY REFUNDED THOSE CUSTOMERS WHO WERE**
15 **INADVERTENTLY CHARGED THIS FEE?**

16 **A.** Yes, we have refunded those customers who were inadvertently charged a meter
17 fee. Rebuttal Exhibit KLS-1 provides the two accounts charged and indicates in the area
18 circled in red that those adjustments have been canceled.

19 **Q. WOULD YOU PLEASE ADDRESS THE CONCERNS OF THE PUBLIC**
20 **WITNESSES WHO TESTIFIED AT THE NIGHT HEARINGS IN THIS DOCKET**
21 **HELD ON OCTOBER 1, 2013?**

22 **A.** Yes, I will.

23 **Michael Bratcher, 1113 Old Denver School Rd, Pendleton, Calhoun Acres**

1 Mr. Bratcher testified about the response time of customer service. Our records
2 show he moved into his home in May 2013 from 104 Dogwood Circle in the Calhoun
3 Acres subdivision in USSC's service territory and no calls to Customer Service have
4 been logged since he moved into this address. Our records show Mr. Bratcher resided at
5 104 Dogwood Circle for approximately 11 years. His last call to our office at that
6 address was in March 2009 regarding a water leak at the meter. Our contractor repaired
7 the leak the same day.

8 **Scott Johnson, 509 Old Shoals Dr, Anderson, Hidden Lake Subdivision**

9 Prior to July 2013, the last call Mr. Johnson made to our Customer Service office
10 was in March 2007 concerning low water pressure. Our Operations staff was dispatched
11 and determined the pressure to be 65 psi which is within the acceptable range. Our
12 records indicate Mr. Johnson filed an ORS complaint in July 2013 alleging a high bill due
13 to the pass-through charge of the bulk provider invoice. This complaint is still ongoing.

14 **Melanie Wilson, 1010 Windwood Dr, Anderson, Lakewood Subdivision**

15 Our records indicate Ms. Wilson's last contact to our company was in August
16 2011 for a high bill complaint. Our operator verified the reading as being inline. He
17 spoke to Ms. Wilson and she reported she ran water on new grass after she made a septic
18 line repair.

19 **Dennis Hinman, 104 Richfield Dr, Anderson, Hidden Lakes Subdivision**

20 Our records indicate Mr. Hinman's last contact to our company was in February
21 2008 for a high bill complaint. He reported he does run his irrigation system but didn't
22 think it could cause his high usage. Our operator verified the reading as being inline and

1 advised the customer to check his irrigation system for any possible leaks or broken
2 sprinkler heads when the system is running.

3 **Otto Haugland, 145 Live Oak Ct, Anderson, Towncreek Acres Subdivision**

4 Our records indicate Mr. Haugland's last contact to our company was in October
5 2010 regarding his phone lines possibly being cut after a water line was repaired on his
6 street. Our operator was unaware of any phone line being cut and encouraged him to
7 contact the telephone company regarding his phone line. He did not contact us back after
8 that date.

9 **Carol Cook, 35 Widewater Ct, Iva, Purdy Shores Subdivision**

10 Our records indicate Ms. Cook last contacted the company on October 8, 2013,
11 after the night hearing regarding a water quality issue. Our field operator determined the
12 water provided by the bulk provider was low in chlorine. The operator took the
13 necessary steps to notify the bulk provider. Prior to this call, the last contact by Ms.
14 Cook was in April 2008 to report a water leak. The operator determined the leak was in
15 Ms. Cook's service line and advised she would need to make the necessary repair to her
16 line.

17 **James Deaton, 203 Fieldcrest Dr, Anderson, Fieldcrest Subdivision**

18 Our records indicate Mr. Deaton last contacted the company in July 2013
19 regarding a possible leak across the road by his mailbox. Our field operator determined
20 the standing water to be caused by rainwater and not a leak in the water main.

21 **Claire Hicks, 212 Arcadia Dr, Anderson, Towncreek Acres Subdivision**

1 Our records indicate Ms. Hicks last contacted the company in March 2010 for a
2 high bill complaint. Our operator verified the reading as being inline and the bill was
3 accurate.

4 **Pauline Walsh, 1009 Windward Drive, Anderson, Lakewood Subdivision**

5 Ms. Walsh testified that her billing period varies from 27 to 36 days and that she
6 is given 8 days to pay her bill.

7 A review of Ms. Walsh's billing records during the test year to date indicates her
8 service period has averaged 30 days between meter reads. In addition, no pro-ration of
9 the base facility charges occurred on her account during this time period. In regard to the
10 number of days to pay the bill, customers are given 25 days to pay their bill from the date
11 of issuance. Rebuttal Exhibit KLS-2 contains the billing history of Ms. Walsh from
12 January 16, 2012 to October 13, 2013. I would draw your attention to the column titled
13 "# of days till due" which demonstrates she given at least 25 days from the bill issuance
14 date to pay her bill before incurring a late payment charge. I would also like to draw
15 your attention to the column titled "# of days in service period" which indicates the
16 number of days between the start and end of the service period, with an average of 30
17 days during the test year to date.

18 **Q. WOULD YOU PLEASE ADDRESS THE CONCERNS OF THE PUBLIC**
19 **WITNESSES WHO TESTIFIED AT THE NIGHT HEARING IN THIS DOCKET**
20 **HELD ON OCTOBER 3, 2013?**

21 **A.** Yes, I will.

22 **Gregory Bridges, 2990 Shandon Rd, Rock Hill, Shandon Subdivision**

1 Our records indicate Mr. Bridges experienced a broken sewer line in his backyard
2 in July 2005. This was caused by a broken joint in the sewer main. Our contractor made
3 the necessary repairs by replacing a 14 foot section of sewer main. This call has been the
4 only call made to the Customer Service Department.

5 **Gales Scroggs, 206 Pelham Lane, Fort Mill, Foxwood Subdivision**

6 Mr. Scroggs testified that he owns the home at 206 Pelham Lane in the Foxwood
7 subdivision. He testified the home is vacant but continues to receive a bill each month
8 for the base facility charge. Mr. Scroggs testified he contacted the Customer Service
9 Department but had not received a call back.

10 A review of Mr. Scroggs' meter consumption and billing history indicate that has
11 been billed for base facility charges and zero usage since the November 5, 2012 bill. We
12 regret that our Customer Service Department failed to follow up with Mr. Scroggs after
13 his call to the company in February 2013, as it is company procedure to do so. Since the
14 hearing held on October 3, 2013, we have reached out to Mr. Scroggs to confirm he
15 would like us to lock off the meter. Mr. Scroggs did agree to have the meter locked off
16 and the company has agreed to waive the base facility charges billed over the last 12
17 months during the time period in which the meter registered zero usage.

18 **James Knowlton, 306 Brookside Dr, Fort Mill, Foxwood Subdivision**

19 Our records indicate Mr. Knowlton contacted our office on May 4, 2011 to report
20 no water. Our operator immediately responded and contacted Mr. Knowlton. Mr.
21 Knowlton reported his water was back on and that he was surprised at how quickly water
22 was restored.

23 **Other Witnesses**

1 Mssrs. Royster, Cox, Taylor and Snider testified at the night hearing in Anderson
2 County about the financial impact of the requested rates but our records do not reflect
3 that these witnesses have ever called USSC for any reason.

4 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

5 **A. Yes.**

REBUTTAL EXHIBIT KLS-1

Adjustment - Windows Internet Explorer

File Edit View Favorites Tools Help

Utilities, Inc. Conferencing ... Bongo CCM JDE U2 Webmail U2WaterMan - Home Utilities Inc. Health Advocate Paychex My Meetings TCC U2 CCM Interfaces Web Help Desk Password Management

U2WaterMan - Home Adjustment U2er https://mymeeting.uwater....

Oracle Utilities Customer Care and Billing V2.1.6 Adjustment Wednesday, October 16, 2013

Main Characteristics Transfer Adjustment A/P Request

Adjustment Info \$75.00, HTRSETVA - Meter Set Fee Variable Adjustment, STATUS DESCR Adjustment ID 456912649C27

Account ID 4569127586 LEDLAND PROPERTIES, LLC, Residential, \$-59.56, 4569127586

Service Agreement 4569127589 401 Utilities Services of SC Water Residential/Reactivated, 05-29-2012, 09-06-2012, \$-75.00, 4569127589

Premise 132 BEYTHGRASS LN, GASTON, SC, 29053, Residential-Single Family, 401 (Subdivision 042)

Adjustment Type HTRSETVA Meter Set Fee Variable Adjustment Creation Date 05-25-2012

Amount \$75.00

Adjustment Status Canceled Cancel Reason Internal Error

Comments METER FEE CHARGED IN ERROR. NOT AUTHORIZED IN TARIFF. KS

Financial Transaction ID	Amends Date	Accounting Date	Current Amount	Payoff Amount	Bill ID
456913420664	06-18-2012	10-16-2013	\$-75.00	\$-75.00	
456919595416	06-18-2012	05-25-2012	\$75.00	\$75.00	456912729713

Adjustment Actions Generate Freeze Cancel Delete

Record successfully updated

Start Inbox - Microsoft ... Reminders Adjustment - Win... DRAFT Basic Ref... RE: Issues to be ... DAL 1, 129 Address... USCC Adjustments Document 1 - Proc... 36% Local internet 100% 2:43 PM

Alerts
Last Contact: 314 days ago - System/Batch
Credit Rating: 500
Active Write Off SA
Reactivated SA Exist

Current Context
LEDLAND PROPERTIES, LLC - Primary Phone Number (803) 785-5263
4569127586 LEDLAND PROPERTIES, LLC, Residential, \$-59.56, 4569127586
132 BEYTHGRASS LN, GASTON, SC, 29053, Residential-Single Family, 401 (Subdivision 042)

Financial Information
Current Balance \$-59.56
Last Payment 06-19-2012, \$75.00
Last billed 09-09-2012, \$15.21, Due Date 10-04-2012
Previous Bill 06-16-2012, \$-2.27

To Do Summary
Refresh

Current To Do

Customer Contact
Last 314 days ago - System/Batch

Adjustment - Windows Internet Explorer

File Edit View Favorites Tools Help

Utilities, Inc. Oracle Utilities Customer Care and Billing V2.1.0 Adjustment Wednesday, October 16, 2013

Main Characteristics Transfer Adjustment All Requests

Adjustment Info \$75.00, MTRSETVA - Meter Set Fee Variable Adjustment, STATUS DESCR Adjustment ID 39546576322

Account ID 3954651212 WELLS INVESTMENTS LLC, Residential, \$-75.00, 3954651212

Service Agreement 3954651050 401 Utilities Services of SC Water Residential Reactivated, 05-12-2012, 05-16-2012, \$-75.00, 3954651050

Premise 125 ARROWPOINT DR, GASTON, SC, 29053, Residential-Single Family, 401 (Subdivision 042)

Adjustment Type MTRSETVA Meter Set Fee Variable Adjustment Creation Date 05-11-2012

Amount \$75.00

Adjustment Status Canceled Cancel Reason Internal Error Creation Date

Comments METER CHARGED IN ERROR. NOT AUTHORIZED BY TARIFF. KS

Financial Transaction ID	Amount Date	Accounting Date	Current Amount	Payoff Amount	Bill ID
3954652695361	05-16-2012	10-16-2013	\$-75.00	\$-75.00	
3954653173614	05-16-2012	05-11-2012	\$75.00	\$75.00	395465115264

Adjustment Actions Generate Freeze Cancel Delete

Record successfully updated

Start Inbox - Microsoft... Reminders Adjustment - Win... DRAFT Basic Ref... RE: Issues to be ... DL 1,129 Address... USC Adjustments Document1 - Moz... 38% Local intranet 100% 2:49 PM

Dashboard

Alerts

Reactivated SAs Exist

Current Context

WELLS INVESTMENTS LLC - Primary Phone Number: (803) 732 2968

3954651212 & WELLS INVESTMENTS LLC, Residential, \$-75.00, 3954651212

125 ARROWPOINT DR, GASTON, SC, 29053, Residential-Single Family, 401 (Subdivision 042)

Financial Information

Current Balance \$-75.00

Last Payment 07-10-2012, \$75.00

Last Bill 05-16-2012, \$27.99, Due Date 06-11-2012

To Do Summary

Refresh

Current To Do

Customer Contact

Type

Comment

REBUTTAL EXHIBIT KLS-2

Account ID	Bill Status	Bill Date	Due Date	# of Days Till		Service Period	Service Period	# of Days in		Current	Usage
				Due		Start Date	End Date	Service	Period	Amount	
6042300000	Complete	10/13/2013	11/7/2013	25		8/9/2013	9/10/2013	32		\$77.68	9030
6042300000	Complete	9/12/2013	10/7/2013	25		7/10/2013	8/9/2013	30		\$68.63	8230
6042300000	Complete	8/11/2013	9/5/2013	25		6/8/2013	7/10/2013	32		\$87.34	10480
6042300000	Complete	7/11/2013	8/5/2013	25		5/10/2013	6/8/2013	29		\$69.09	8010
6042300000	Complete	6/13/2013	7/8/2013	25		4/10/2013	5/10/2013	30		\$73.73	8270
6042300000	Complete	5/12/2013	6/6/2013	25		3/10/2013	4/10/2013	31		\$66.08	7640
6042300000	Complete	4/11/2013	5/6/2013	25		2/11/2013	3/10/2013	27		\$61.04	6060
6042300000	Complete	3/12/2013	4/8/2013	27		1/11/2013	2/11/2013	31		\$77.97	7340
6042300000	Complete	2/12/2013	3/11/2013	27		12/6/2012	1/11/2013	36		\$85.12	8960
6042300000	Complete	1/13/2013	2/7/2013	25		11/9/2012	12/6/2012	27		\$67.22	6130
6042300000	Complete	12/12/2012	1/7/2013	26		10/8/2012	11/9/2012	32		\$69.13	8060
6042300000	Complete	11/12/2012	12/7/2012	25		9/12/2012	10/8/2012	26		\$73.20	6610
6042300000	Complete	10/10/2012	11/5/2012	26		8/10/2012	9/12/2012	33		\$62.19	6720
6042300000	Complete	9/12/2012	10/8/2012	26		7/11/2012	8/10/2012	30		\$68.37	6900
6042300000	Complete	8/14/2012	9/10/2012	27		6/14/2012	7/11/2012	27		\$61.07	6530
6042300000	Complete	7/12/2012	8/6/2012	25		5/14/2012	6/14/2012	31		\$59.10	6690
6042300000	Complete	6/14/2012	7/9/2012	25		4/11/2012	5/14/2012	33		\$63.80	7460
6042300000	Complete	5/16/2012	6/11/2012	26		3/9/2012	4/11/2012	33		\$61.89	7360
6042300000	Complete	4/16/2012	5/11/2012	25		2/11/2012	3/9/2012	27		\$61.54	6620
6042300000	Complete	3/15/2012	4/9/2012	25		1/14/2012	2/11/2012	28		\$58.86	6190
6042300000	Complete	2/14/2012	3/12/2012	27		12/10/2011	1/14/2012	35		\$75.61	8620
6042300000	Complete	1/16/2012	2/10/2012	25		11/11/2011	12/10/2011	29		\$74.55	8030

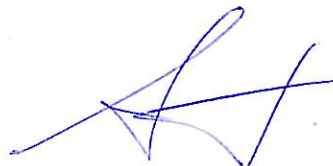
CERTIFICATE OF SERVICE

The undersigned, Scott Elliott, of Elliott & Elliott, P.A., does hereby certify that he has this date served the below-listed parties with a copy of the pleading(s) indicated below by electronically mailing a copy of same to each of the parties per the Stipulation of Electronic Service entered into by the parties on September 5, 2013:

Re: *Application of Utility Services of South Carolina, Inc. for Adjustment of Rates and Charges and Modification of Certain Terms and Conditions for the Provision of Water and Sewer Service*
Docket No. 2013-201-WS

PARTIES SERVED: Jeffrey M. Nelson, Esquire
Florence P. Belser, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

PLEADING: Rebuttal Testimony of Karen Sasic



Scott Elliott, Esquire
Elliott & Elliott, P. A.
1508 Lady Street
Columbia, SC 29201

October 16, 2013